

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

**DR. MARKCUS KITCHENS, JR.,**

**Plaintiff,**

**v.**

**NATIONAL BOARD OF MEDICAL  
EXAMINERS,**

---

**Defendant.**

**Case No. 2:22-CV-03301-JFM**

**TRIAL DEPOSITION DESIGNATIONS**

Pursuant to the Court's May 18, 2023 Order (Dkt. 71), plaintiff and defendant hereby file their deposition designations, counter-designations, and objections, in the Transcript of Christina Bacon, LPP (April 13, 2023).

Testimony designated by both parties is highlighted in pink.

Testimony designated solely by plaintiff is highlighted in green.

Testimony designated solely by defendant is highlighted in yellow.

Objections are shown in comments, at 12:7-9, 13:3-5, and 59:6-8.

The parties are also filing herewith exhibits CB-1, CB-2, CB-6, and CB-7, as referenced in the deposition designations, and they request that these documents be added to the trial record.

Dated: June 1, 2023

Respectfully submitted,

/s/ Dr. Marcus Kitchens (with permission)

625 Hampton Way, #2

Richmond, KY 40475

(423) 314-4096

[markzwanz@gmail.com](mailto:markzwanz@gmail.com)

Pro se Plaintiff

/s/ Caroline M. Mew

Caroline M. Mew - *admitted pro hac vice*

Perkins Coie LLC

700 13th Street, NW, Suite 800

Washington, DC 20005

Tel: 202-654-1767

Fax: 202-654-6211

cmew@perkinscoie.com

Jared D. Bayer

Cozen O'Connor

One Liberty Place

1650 Market Street, Suite 2800

Philadelphia, PA 19103

Tel: 215-665-4127

Fax: 215-701-2427

Attorneys for National Board of Medical  
Examiners

**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2023, a true and correct copy of the foregoing document and attachments was served by electronic mail on the following:

Dr. Marcus Kitchens Jr.  
625 Hampton Way, #2  
Richmond, KY 40475  
[markzwanz@gmail.com](mailto:markzwanz@gmail.com)

/s/ Caroline M. Mew  
Caroline M. Mew